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**IN UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

**BRIDGESTONE SPORTS CO., LTD.,  
and BRIDGESTONE GOLF, INC.,**

**Plaintiffs,**

**v.**

**ACUSHNET COMPANY,**

**Defendant.**

C.A. No. 05-132(JJF)

DEMAND FOR JURY TRIAL

**PLAINTIFFS' THIRD SUPPLEMENTAL RESPONSES TO  
DEFENDANT'S FIRST SET OF INTERROGATORIES**

Pursuant to Rule 33 of the Federal Rules at Civil Procedure, Plaintiffs Bridgestone Sports Co., Ltd. and Bridgestone Golf, Inc. (individually or collectively "Bridgestone") hereby supplement Plaintiffs' First and Second Responses to Defendant's Set Of First Interrogatories To Plaintiff dated July 11, 2005 and January 6, 2006, respectively.

**GENERAL OBJECTIONS**

The General and Specific Objections set forth in Plaintiffs' First Responses to Defendant's First and Second Set of Interrogatories are incorporated herein by reference. Subject to, and without waiving, any of the General and Specific Objections, Bridgestone hereby supplements its responses to Interrogatory Nos. 1 and 2.

**SPECIFIC OBJECTIONS AND RESPONSES**

**INTERROGATORY NO. 1**

Identify on a claim-by-claim basis for the Bridgestone Patents, each Acushnet product that you contend infringes any claim of the Bridgestone Patents.

**RESPONSE TO INTERROGATORY NO. 1**

Subject to and without waiving the general objections and the specific objections in Bridgestone's responses to Interrogatory No. 1, Bridgestone supplements its previous response as follows.

11. At least claims 1, 3 and 5-13 of the '652 patent is infringed by the Titleist® Pro V1 (star) golf ball, and all other golf balls made or sold by Acushnet under a different brand and being substantially identical to the foregoing golf ball.

12. At least claims 1-4 and 6-8 of the '852 patent is infringed by the Titleist® Pro V1 (star) golf ball, and all other golf balls made or sold by Acushnet under a different brand and being substantially identical to the foregoing golf ball.

Bridgestone reserves the right to later amend and/or supplement its contentions after further investigation and discovery.

**INTERROGATORY NO. 2**

For each claim that is alleged to be infringed by Acushnet in your RESPONSE TO INTERROGATORY NO. 1, provide a claim chart that describes in detail on an element-by-element basis how you contend each product identified infringes each claim, specifying whether such infringement is alleged to be literal and/or under the doctrine of equivalents.

**RESPONSE TO INTERROGATORY NO. 2**

Subject to and without waiving the general objections and the specific objections in

Bridgestone's responses to Interrogatory No. 2, Bridgestone supplements its previous response as follows.

Upon information and belief, Bridgestone responds with the claim charts set forth below.

The '652 Patent	Pro V1 (2003-present)
<b>CLAIM 11</b>	
11. The solid golf ball of claim 1, wherein said sulfur compound is blended in an amount of from about 0.1 to about 0.5 parts by weight.	The Pro V1 has a rubber composition containing a sulfur compound blended in an amount within the scope of the claimed range.

The '652 Patent	Pro V1 (star)
<b>CLAIM 1</b>	
1. A solid golf ball, having an improved rebound property and initial velocity, comprising;	The Pro V1 (star) is a solid golf ball having an improved rebound property and initial velocity.
a rubber composition containing 100 parts by weight of a base rubber selected from the group consisting of polybutadiene rubber, natural rubber, polyisoprene rubber and styrene-butadiene rubber,	The Pro V1 (star) has a rubber composition containing 100 parts by weight of a base rubber selected from the group consisting of polybutadiene rubber, natural rubber, polyisoprene rubber and styrene-butadiene rubber.
about 25 to about 40 parts by weight of a zinc or magnesium salt of an unsaturated fatty acid having 3 to 8 carbon atoms,	The Pro V1 (star) has a rubber composition containing zinc or magnesium salt of an unsaturated fatty acid having 3 to 8 carbon atoms in an amount within the scope of the claimed range.

The '652 Patent	Pro V1 (star)
about 0.05 to about 2 parts by weight of a sulfur compound selected from the group consisting of pentachlorothiophenol, 4-t-butyl-o-thiocresol, 4-t-butyl-p-thiocresol, 2 benzamidothiophenol, thiobenzoic acid, and zinc salts thereof, and	The Pro V1 (star) has a rubber composition containing a sulfur compound selected from the group consisting of pentachlorothiophenol, 4-t-butyl-o-thiocresol, 4-t-butyl-p-thiocresol, 2 benzamidothiophenol, thiobenzoic acid, and zinc salts thereof in an amount within the scope of the claimed range.
about 0.5 to about 3 parts by weight of an organic peroxide.	The Pro V1 (star) has a rubber composition containing an organic peroxide within the scope of the claimed range.
<b>CLAIM 3</b>	
3. The solid gold ball of claim 1, wherein said solid golf ball core and a cover enclosing the core, and said core is formed of said rubber composition.	The Pro V1 (star) comprises a core and a cover, wherein the core comprises the rubber composition described above.
<b>CLAIM 5</b>	
5. The solid gold ball of claim 3, wherein said solid golf ball further comprises an intermediate layer between the core and the cover.	The Pro V1 (star) further comprises an intermediate layer between the core and the cover.
<b>CLAIM 6</b>	
6. The solid golf ball of claim 1, wherein said base rubber is a polybutadiene rubber.	The base rubber of the Pro V1 (star) is polybutadiene rubber.
<b>CLAIM 7</b>	
7. The solid gold ball of claim 6, wherein said polybutadiene rubber is a poly(1,4-butadiene) rubber containing at least 40 mol % of cis-1,4 bond.	The polybutadiene rubber of the Pro V1 (star) is a poly(1,4-butadiene) rubber containing a mol % of cis-1,4 bond within the scope of the claimed range.
<b>CLAIM 8</b>	



The '652 Patent	Pro V1 (star)
8. The solid golf ball of claim 7, wherein said poly(1,4-butadiene) rubber contains at least 80 to 100 mol % of cis-1,4 bond.	The poly(1,4-butadiene) rubber of the Pro V1 (star) contains a mol % of cis-1,4 bond within the scope of the claimed range.
<b>CLAIM 9</b>	
9. The solid golf ball of claim 7, wherein said base rubber comprises at least 80% by weight of said poly(1,4-butadiene) rubber.	The base rubber of the Pro V1 (star) has poly(1,4-butadiene) rubber within the scope of the claimed range.
<b>CLAIM 10</b>	
10. The solid golf ball of claim 9, wherein said poly(1,4-butadiene) rubber is blended with a natural rubber, a polyisoprene rubber or a styrene-butadiene rubber.	The poly(1,4-butadiene) rubber of the Pro V1 (star) golf ball is blended with a natural rubber, a polyisoprene rubber or a styrene-butadiene rubber.
<b>CLAIM 11</b>	
11. The solid golf ball of claim 1, wherein said sulfur compound is blended in an amount of from about 0.1 to about 0.5 parts by weight.	The Pro V1 (star) has a rubber composition containing a sulfur compound blended in an amount within the scope of the claimed range.
<b>CLAIM 12</b>	
12. The solid golf ball of claim 1, wherein said organic peroxide is selected from the group consisting of dicumyl peroxide, t-butylperoxybenzoate, di-t-butylperoxide, 1,1-bis (t-butylperoxy)-3,3,5-trimethyl-cyclohexane, n-butyl-4,4-bis (t-butylperoxy)valerate, 2,2'-bis (t-butylperoxyisopropyl)benzene, and 2,5-dimethyl-2,5-di(t-butylperoxy)hexene,	The Pro V1 (star) has a rubber composition containing dicumyl peroxide.
<b>CLAIM 13</b>	

The '652 Patent	Pro V1 (star)
13. The solid golf ball of claim 1, wherein said rubber composition further comprises a filler.	The Pro V1 (star) has a rubber composition comprising a filler.

The '652 Patent	Pro V1 (star)
<b>CLAIM 1</b>	
1. A three-piece solid golf ball comprising;	The Pro V1 (star) is a three-piece solid golf ball.
a center core, an intermediate layer, and a cover enclosing the core through the intermediate layer,	The Pro V1 (star) has a center core, an intermediate layer, and a cover enclosing the core through the intermediate layer.
said center core having a diameter of at least 29 mm and a specific gravity of less than 1.4,	The center core of the Pro V1 (star) has a diameter and a specific gravity within the scope of the claim ranges.
said intermediate layer having a thickness of at least 1 mm, a specific gravity of less than 1.2, and a hardness of at least 85 on JIS C scale, the specific gravity of said intermediate layer being lower than the specific gravity of said center core, and	The intermediate layer of Pro V1 (star) has an intermediate layer having a thickness, a specific gravity of less than 1.2, and a hardness within the scope of the claim ranges, and the specific gravity of the intermediate layer is lower than the specific gravity of the center core.
said cover having a thickness of 1 to 3 mm and being softer than said intermediate layer.	The Pro V1 (star) has a cover with a thickness within the scope of the claim range.
<b>CLAIM 2</b>	
2. The golf ball of claim 1 wherein said intermediate layer is formed of a high repulsion ionomer resin base composition.	The Pro V1 (star) has an intermediate layer that is formed of a high repulsion ionomer resin base composition.

The '852 Patent	Pro V1 (star)
<b>CLAIM 3</b>	
3. The golf ball of claim 1 wherein said center core has a hardness of 45 to 80 on JIS C scale and said cover has a hardness of 50 to 85 on JIS C scale.	The Pro V1 (star) has a center core having a hardness and a cover having a hardness within the scope of the claim ranges.
<b>CLAIM 4</b>	
4. The golf ball of claim 1 wherein said center core is comprised of a polybutadiene base rubber composition.	The center core of the Pro V1 (star) is comprised of a polybutadiene base rubber composition.
<b>CLAIM 6</b>	
6. The golf ball of claim 1 wherein a difference in the specific gravity between the center core and the intermediate layer is in the range of 0.1 to 0.5.	The difference in the specific gravity between the center core and the intermediate layer of the Pro V1 (star) is within the scope of the claim range.
<b>CLAIM 7</b>	
7. The golf ball of claim 1 wherein the specific gravity of said intermediate layer is in the range of 0.9 to 1.0.	The specific gravity of the intermediate layer of the Pro V1 (star) is within the scope of the claim range.
<b>CLAIM 8</b>	
8. The golf ball of claim 1 wherein the hardness of said intermediate layer is in the range of 85-100 on JIS C.	The hardness of the intermediate layer of the Pro V1 (star) is within the scope of the claim range.



Bridgestone reserves the right to later amend and/or supplement its disclosures after further investigation and discovery.

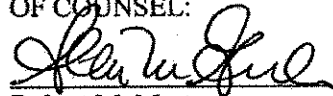
As to objections:

MORRIS, NICHOLS, ARSHT & TUNNELL

DATED: January 30, 2006

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

BRIDGESTONE SPORTS CO., LTD.,	)	
and BRIDGESTONE GOLF, INC.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
ACUSHNET COMPANY,	)	C. A. No. 05-132 (JJF)
	)	
Defendant.	)	
	)	
<hr/> ACUSHNET COMPANY,	)	<b>DEMAND FOR JURY TRIAL</b>
	)	
Counterclaim Plaintiff,	)	
	)	
v.	)	
	)	
BRIDGESTONE SPORTS CO., LTD.	)	
and BRIDGESTONE GOLD, INC.	)	
	)	
Counterclaim Defendant.	)	

**ACUSHNET'S OBJECTIONS AND RESPONSES TO  
BRIDGESTONE'S THIRD SET OF INTERROGATORIES  
DIRECTED TO ACUSHNET (NOS. 40-42)**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, defendant and counterclaim plaintiff Acushnet Company ("Acushnet") hereby responds to Bridgestone Sports Co., Ltd.'s and Bridgestone Golf, Inc.'s (collectively, "Bridgestone") Third Set of Interrogatories Directed to Acushnet (Nos. 40-42) ("Third Set of Interrogatories").

**ACUSHNET'S GENERAL STATEMENT AND GENERAL OBJECTIONS**

1. Acushnet incorporates by reference its General Statement and Objections to Bridgestone's First Set of Interrogatories as if fully restated herein.

**ACUSHNET'S OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS**

2. Acushnet incorporates by reference its Objections to the Definitions and Instructions to Bridgestone's First Set of Interrogatories as if fully restated herein.

## RESPONSES

### Interrogatory No. 40:

Identify each golf ball made, used, sold or offered for sale by Acushnet that contains or is manufactured using a compound that contains sulfur in any amount, including but not limited to the following sulfur-containing compounds: pentachlorothiophenol, 4-t-butyl-o-thiocresol, 4-t-butyl-p-thiocresol, 2-benzamidothiophenol, thiobenzoic acid and zinc salts of pentachlorothiophenol, 4-t-butyl-o-thiocresol, 4-t-butyl-p-thiocresol, 2-benzamidothiophenol, thiobenzoic acid, and identify all documents (by production number) that shows the composition containing such sulfur or sulfur-containing compounds for each such golf ball.

### Response to Interrogatory No. 40:

Acushnet incorporates all of its General Objections and Objections to Definitions as though fully set forth herein and further specifically objects to this interrogatory as compound, overbroad and irrelevant to the extent it requests information for golf balls other than the Titleist ProV1, Titleist Pro V1x, Titleist NXT, Titleist NXT Tour, Titleist DT SoLo and Pinnacle Exception golf balls. Acushnet further objects to this interrogatory as overbroad and unduly burdensome to the extent it requires Acushnet to identify "all" documents that show such compositions. Subject to and without waiving its objections, Acushnet responds that at least some productions of each of the following golf balls are manufactured using a sulfur-containing compound: Titleist ProV1 (see AB0015430-AB0015449, AB0015519-AB0015562, AB0038341-AB0038361, AB0038532-AB0038560); Titleist Pro V1x (see AB0015471-AB0015479, AB 0015563-AB0015617); Titleist NXT (see AB0015338-AB0015373, AB0035500-AB0035517), Titleist NXT Tour (see AB0015391-AB0015429, AB0036381-AB0036405, AB0036589-AB0036610, AB0036906-AB0036906); Titleist DT SoLo (see AB 0015274-AB0015303); and Pinnacle Exception (AB 0015304-AB0015337, AB 0056201-AB0056217).

Acushnet reserves the right to supplement its response to this interrogatory upon additional review and/or information.



Nov-10-05 02:57am From-HOWREY SIMON

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T-412 P.02/03 F-521



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November 10, 2005

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FILE 00634 0002

BY FACSIMILE

Steven M. Gruskin, Esq.  
Sughrue Mion, PLLC  
2100 Pennsylvania Avenue, N.W.  
Washington, D.C. 20037-3213

Re: Bridgestone Sports Co. v. Acushnet Co.,  
Civil Action No. 05-132 (JJF) (D. Del.)

Dear Steve:

I have enclosed a listing of all golf balls sold by Acushnet since 2000, as discussed at the October 5, 2005 discovery hearing.

Please let me know if you have any questions.

Regards,

A handwritten signature in cursive script, appearing to read "Brian S. Seal".  
Brian S. Seal

Enclosure



Nov-10-05 02:57am From:HOWREY SIMON

T-412 P.03/03 F-521

## Titleist/Pinnacle Product Line 2000 - 2005

2000

Titleist	side stamp
Professional	Professional 90, 100
Tour Prestige	Tour Prestige 90, 100
Tour Soft	Tour Soft 90, 100
Tour Soft SF	Tour Soft SF 90, 100
HP Tour	HP Tour
HP Soft	HP Soft
HP Soft SF	HP Soft SF
DT 8201	DT 8201
DT Distance	DT Distance
Pro VI (ten tour only)	Pro VI 392

2001

Titleist	side stamp
Pro VI	Pro VI 392
Professional	Professional 90, 100
Tour Prestige	Tour Prestige 90, 100
Tour Soft	Tour Soft 90, 100
HP Tour	HP Tour
HP Soft	HP Soft
DT 8201	DT 8201
DT Distance	DT Distance

2002

Titleist	side stamp
Pro VI	Pro VI 392
Pro VI (star)	Pro VI (star)
Professional	Professional 90, 100
Tour Prestige	Tour Prestige 90, 100
Tour Soft	Tour Soft 90, 100
HP Tour	HP Tour
HP Soft	HP Soft
DT 8201	DT 8201
DT Distance	DT Distance
HVC Tour	HVC Tour
HVC Distance L	HVC Distance L

Jd 11/20/05

Pinnacle	side stamp
Titanium Extreme Distance	Extreme Distance
Titanium Precision Spin	Precision Spin
Titanium Precision Feel	Precision Feel
Gold Distance	Gold Distance
Gold Spin	Gold Spin
Gold Equalizer	Gold Equalizer
Gold for Women	pink ribbon logo

Pinnacle	side stamp
Titanium Extreme Distance	Extreme Distance
Titanium Precision Spin	Precision Spin
Titanium Precision Feel	Precision Feel
Gold Distance	Gold Distance
Gold Spin	Gold Spin
Gold Equalizer	Gold Equalizer
Gold for Women	pink ribbon logo
392 LS	392 LS

Pinnacle	side stamp
Power Core Straight Distance	Straight Distance
Power Core Soft Feel	Soft Feel
Gold Distance	Gold Distance
Gold Lady	pink ribbon logo
Gold Senior	Gold Senior
Power 392	Distance LS

2003

Titleist	side stamp
Pro VI	Pro VI 392
Pro VI 392	Pro VI 392
NXT	NXT
NXT Tour	NXT Tour
DT 8201	DT 8201
HP Tour	HP Tour
HP Soft	HP Soft
HP Soft SF	HP Soft SF
HVC Soft Distance	HVC Soft Distance
HVC Soft Distance L	HVC-L

2004

Titleist	side stamp
Pro VI	Pro VI 392
Pro VI 392	Pro VI 392
NXT	NXT
NXT Tour	NXT Tour
DT 8201	DT 8201
HP Tour	HP Tour
HP Soft	HP Soft
HP Soft SF	HP Soft SF
HP Distance MX	HP Distance MX
HP Distance LS	HP Distance LS
HVC Soft Feel	HVC - Soft Feel
HVC Soft Distance	HVC Soft Distance
HVC-L	HVC-L

2005

Titleist	side stamp
Pro VI	Pro VI 392
Pro VI 392	Pro VI 392
NXT	NXT
NXT Tour	NXT Tour
DT 8201	DT 8201
HP Tour	HP Tour
HP Soft	HP Soft
HP Soft SF	HP Soft SF
HP Distance MX	HP Distance MX
HP Distance LS	HP Distance LS
HVC Soft Feel	HVC - Soft Feel

Pinnacle	side stamp
Power Core Straight Distance	Straight Distance
Power Core Soft Feel	Soft Feel
Gold Distance	Gold Distance
Gold Lady	pink ribbon logo
Gold Senior	Gold Senior
Titanium Distance	Distance LS

Pinnacle	side stamp
Exception	Gold logo
Gold Distance	Gold Distance
Gold Maximum Velocity	Max Velocity
Gold Lady	pink ribbon logo
Power Core	Power Core

Pinnacle	side stamp
Exception	Gold logo
Gold Distance	Gold Distance
Gold Maximum Velocity	Max Velocity
Gold Lady	pink ribbon logo
Power Core	Power Core



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